

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matters of

Implementation of the Local
Competition Provisions of the
Telecommunications Act of 1996

Petition of U S WEST Communications,
Inc. for Waiver of Dialing Parity
Dates Established in March 23, 1999
Dialing Parity Order

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CC Docket No. 96-98

NSD File No. 99-XXX

PETITION FOR WAIVER OF U S WEST COMMUNICATIONS, INC.

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May 12, 1999

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PETITION FOR WAIVER OF U S WEST COMMUNICATIONS, INC.

I. **INTRODUCTION AND SUMMARY**

U S WEST Communications, Inc. ("U S WEST"), pursuant to 47 C.F.R. Section 1.3, petitions this Federal Communications Commission ("Commission" or "FCC") for a limited waiver of the July 22, 1999 implementation date for intraLATA dialing parity, as established by the Commission in its recent March 23 Dialing Parity Order.¹ Specifically, U S WEST seeks a waiver with respect to a small geographic area in two states, involving three wire centers and affecting less than 1,000 access lines.

¹ In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, NSD File No. 98-121, Order, FCC 99-54, rel. Mar. 23, 1999.

As outlined further below, the recent federal legal holdings associated with the imposition of intrastate toll dialing parity, combined with the Commission's failure to take action on a Petition filed in January, 1998 asking for federal preemption over the South Dakota exchange sales,² has created legal obligations with respect to intrastate dialing parity that were not anticipated by U S WEST. Indeed, such obligations were inconsistent with existing state legislative mandates.

The conjunction of these newly-articulated legal obligations with existing switching equipment that cannot support intrastate dialing parity in a small portion of North Dakota and South Dakota communities puts U S WEST in the position of needing a limited waiver. Three wire centers in South Dakota (which also serve less than 100 North Dakota customers) are affected by a decision made late last year and early this year to change out existing switching equipment. The equipment will not even be installed and turned over to U S WEST by the vendor until late August. It will then take a number of months to convert and test the new switching equipment that will be capable of providing dialing parity.

The switching equipment at issue was the subject of a contract of sale to the Telephone Authority, organized under the authority of the Cheyenne River Sioux

² The Cheyenne River Sioux Tribe Telephone Authority's and U S WEST Communications, Inc.'s Joint Petition for Expedited Ruling Preempting South Dakota Law, CC Docket No. 98-6, filed Jan. 22, 1998 ("U S WEST's 1998 Petition"). In that Petition, U S WEST argued that the actions of the State Commission, in denying the exchange sales on the grounds that the Telephone Authority refused to waive its sovereign immunity, were in contravention of 47 U.S.C. Section 253(d) in that they prohibited or had the effect of prohibiting the Tribal Authority from providing intrastate telecommunications service. Thus, U S WEST and the Telephone Authority asked for Commission intervention in the form of preemption. No action has been taken on the Petition.

Tribe, which was executed in December, 1994. The equipment subject to the sale -- all physically located on Indian Reservation land -- was not slated for an upgrade after 1994 because of the "impending" transfer from U S WEST to the Telephone Authority. Furthermore, the equipment is not Y2K compliant.

The culmination of the sale has been delayed, however, as a result of rulings by the South Dakota Public Utilities Commission ("State Commission"). Those rulings have been challenged in the past and continue to be challenged, not only in state fora but before this Commission as well. Because no positive resolution of the legal contention has been forthcoming, at the end of 1998, U S WEST began to revise its expectations regarding the to-be-sold equipment. Since it was increasingly apparent that such equipment might remain under U S WEST's ownership and control for a number of months more, U S WEST began to assess the equipment for Y2K compliance.

As discussed further below, the fact that both North Dakota and South Dakota had statutory prohibitions against the immediate deployment of dialing parity and that the FCC's dialing-parity rules had been vacated, resulted in dialing-parity considerations not being a driving factor in U S WEST's initial assessment of the continued viability of the equipment into the twenty-first century; or the need to change-out the equipment according to a timeframe more accelerated than that worked out by U S WEST in the first quarter of 1999.

In February of 1999, U S WEST purchased new DMS10 switching equipment to serve those North Dakota and South Dakota communities affected by the pending sale in a Y2K compliant manner. The recent dialing-parity rulings,

however, make clear that dialing-parity functionality is as critical as Y2K compliance with respect to the equipment serving those Dakota communities.

The purchased DMS10 switches can be made dialing-parity capable.

However, as explained further below, due to the current installation and cutover timeline associated with this new equipment, as well as other scheduled switch installations, the equipment cannot be expected to incorporate working dialing-parity capabilities until the end of this year. For this reason, we request the instant waiver.

II. CIRCUMSTANCES NECESSITATING THE INSTANT WAIVER

A. Legal/Regulatory Environment

As the Commission recently acknowledged in its March 23, 1999 Dialing Parity Order, its previously-promulgated dialing-parity rules were vacated by the Eighth Circuit Court of Appeals in August of 1997.³ At the same time that court action was occurring, there existed a statutory provision in South Dakota that alleviated U S WEST from any obligation to provide dialing parity until the time that we were permitted to enter the interLATA, interexchange toll market.⁴

³ California v. FCC, 124 F.3d 934 (8th Cir. 1997), cited in the March 23 Dialing Parity Order at ¶ 3 and n. 14.

⁴ S.D.L.C. 49-31-87. After the Supreme Court decision in FCC, et al., v. Iowa Utils. Bd., et al., No. 97-1519, 1999 WL 80281 (U.S. Feb. 22, 1999), the South Dakota legislature amended the referenced statutory section to require intraLATA toll dialing parity on January 1, 2000.

Similarly, in North Dakota, the legislature had promulgated a statute exempting all local exchange carriers (“LEC”) from having to provide dialing parity.⁵

Because U S WEST was not actively seeking to provide interLATA, interexchange services in South Dakota in the 1997-1998 timeframe, under then-existing jurisprudence and legislative imperatives, there was no reason for U S WEST to be reviewing its telecommunications equipment inventory for dialing-parity capabilities within that state. Similarly, due to the North Dakota exemption from dialing-parity obligations, the lack of such capabilities in switching equipment serving North Dakota citizens was not of significant concern to U S WEST. Indeed, as outlined above, U S WEST was paying more attention to the Y2K capabilities of the equipment that was subject to the pending sale between U S WEST and the Telephone Authority than to the dialing-parity capabilities.

In January of this year, the Supreme Court overruled the opinion of the Eighth Circuit and reinstated the Commission’s dialing-parity rules.⁶ Thereafter, the Commission promulgated its March 23 Dialing Parity Order outlining how affected LECs were to implement dialing parity across the nation on a going-forward basis.

⁵ 1999 N.D. Cent. Code, Section 49-21-08.1 (dialing parity may not be required to be provided by any company providing local exchange service), *expires on July 31, 1999*; amended by Senate Bill 2420 approved by the Governor, Mar. 17, 1999 (extending date for dialing-parity implementation to January 1, 2000).

⁶ AT&T Corp., et al. v. Iowa Utilities Board, et al., 119 S.Ct. 721 (1999).

In that Order, the Commission made specific note of the fact that “[n]o [dialing parity] proceeding [was] pending in North Dakota and South Dakota.”⁷ The absence of any prior dialing-parity proceeding in either North Dakota or South Dakota, in conjunction with the long-standing pending sale of equipment in three South Dakota wire centers, has created a situation in which U S WEST is unable to implement dialing parity in those wire centers because the existing equipment cannot accommodate such capability in any reasonably cost-effective manner. These facts are outlined further below.

B. South Dakota And North Dakota Filed Dialing-Parity Plans

In its March 23 Dialing Parity Order, the FCC required that LECs, such as U S WEST, implement 2-PIC (“Preferred Carrier”) toll dialing parity 30 days following state approval of a toll dialing-parity plan. U S WEST’s plan for dialing parity in South Dakota was filed with the South Dakota Public Utilities Commission on April 22, 1999. It outlines the statewide implementation of toll dialing parity, acknowledging the need to seek a waiver with this Commission with respect to certain wire centers in South Dakota.

It is anticipated that state PUC approval of the plan will occur no later than 60 days after that date, or around June 22, 1999. Implementation of the plan is expected thirty days after that, or around July 22, 1999.⁸

⁷ March 23 Dialing Parity Order at n. 21.

⁸ These dates reflect the requirements imposed by the Commission’s March 23 Dialing Parity Order ¶ 7.

As indicated above, the dialing-parity plan filed in South Dakota does not contemplate implementing dialing parity in three South Dakota wire centers -- specifically, McIntosh (with 247 access lines),⁹ Timber Lake (with 503 access lines) and Morrystown (with 217 access lines).¹⁰ All told, these three wire centers -- all of which are located within the boundaries of Native American Reservations¹¹ -- involve 967 access lines out of a South Dakota customer base of approximately 250,000 access lines, or .004 percent.

Also, on April 22, 1999, U S WEST filed a dialing-parity plan in North Dakota. That Plan, like the South Dakota plan, pointed out the fact that U S WEST would be seeking a waiver from this Commission with respect to toll dialing-parity obligations attendant to the South Dakota equipment serving a small number of North Dakota customers.

C. Existing Network Architecture Involving The Three Wire Centers

In the past, the above-referenced wire centers have been deployed through a host/remote cluster architecture supported by Ericsson equipment, with the identified offices being "remotes" off of a host in a different South Dakota town (Mobridge). As a result of the exchange sales activities undertaken by U S WEST over the past few years in South Dakota, the host switch in Mobridge was sold to

⁹ Six of these access lines are associated with North Dakota customers.

¹⁰ Seventy-nine of these access lines are associated with North Dakota customers.

¹¹ The Timber Lake exchange is located within the boundaries of the Cheyenne River and Standing Rock Indian Reservations. The McIntosh and Morrystown exchanges are located within the boundaries of the Standing Rock Indian Reservation. See South Dakota Map attached hereto.

one entity (West River Communications), and the wire centers supported by the remotes were to be sold to another entity (Owl River Telephone, Inc. (“Owl River”)).¹²

Due to certain regulatory and legal actions outlined in greater detail below, the sale of the remotes has been stalled, leaving said remotes in U S WEST’s possession for the time being. Moreover, West River Communications, the owner of the host switch (i.e., the Ericsson switch in Mobridge), is replacing it with a new switch that will technically no longer be capable of supporting the affected remote switches.

West River Communications had offered to sell the “host” switch back to U S WEST. However, for sound business reasons outlined below, U S WEST did not consider such purchase to be a wise investment, either from a commercial or policy perspective. Rather, U S WEST chose to purchase new switching equipment that would be Y2K compliant and would support toll dialing-parity functionality. Should the sale ultimately be awarded regulatory approval, the Telephone Authority has agreed to purchase the new equipment.¹³

D. State Regulatory/Judicial Activity

The history of U S WEST’s activity with respect to the sale of the affected wire centers to the Telephone Authority reflects a contentious and litigious journey. In the Petition filed with this Commission in January of 1998, U S WEST outlined

¹² Owl River is a subsidiary of the Telephone Authority.

in great detail the facts and history associated with the exchange sales to the Telephone Authority.¹⁴ While U S WEST is without question an “affected party,” the fundamental disputes associated with the sale are between two South Dakota sovereigns: the tribal Telephone Authority and the State Commission.

In July of 1995, the State Commission denied the sales of the Timber Lake, Morristown and McIntosh telephone exchanges by U S WEST to the Telephone Authority. The State Commission essentially gave four reasons for the denial: 1) that the Telephone Authority, a tribally-chartered organization, refused to waive its sovereign immunity; 2) that because of such immunity, the State could not enforce the collection of gross receipts and sales taxes on the Telephone Authority; 3) that the State Commission would lose regulatory authority over the exchanges after the sales; and 4) approval would constitute an improper delegation of the State Commission’s authority.

U S WEST and the Telephone Authority promptly appealed the decisions to the Circuit Court of Hughes County, South Dakota. In February of 1997, the Court issued a lengthy Memorandum Opinion holding, in essence, that the State Commission had jurisdiction over the exchange sales.¹⁵ However, the Court found that the State Commission’s decision to deny the sales in absence of a waiver of

¹³ This would be consistent with the Telephone Authority’s commitment to provide state-of-the-art equipment and a range of up-to-date services to the exchanges affected by the sale, as it does to its existing customer base.

¹⁴ There, U S WEST referenced what we described as “a procedurally complex set of facts” (at 2) which was presented in Appendix A-1 through A-14.

¹⁵ The complete text of this Court opinion can be found as Attachment 1 to U S WEST’s 1998 Petition, cited note 2, supra.

sovereign immunity conflicted with tribal and federal interests.¹⁶ Thus, in March, 1997, the matter was remanded for reconsideration by the State Commission.

The State Commission entered further decisions in August, 1997, in which it again denied the exchange sales. The State Commission held that the sales were not in the public interest because of a perceived lack of regulatory control over the purchaser and the potential loss of revenue to the state.¹⁷

The matter was appealed a second time to the same South Dakota Circuit Court (Hughes County). The Court entered an order in February, 1998, affirming in total the second decision of the State Commission.¹⁸

U S WEST and the Telephone Authority then appealed to the South Dakota Supreme Court, the highest level of appellate review in South Dakota. The parties submitted briefs, and oral argument was made to the Court on January 13, 1999. In South Dakota, it is customary to receive Supreme Court decisions within approximately six months from the date of the oral argument.

Since the oral argument before the Supreme Court, there have been discussions among the various interested participants, i.e., State of South Dakota, the State Commission, the Telephone Authority and U S WEST, to resolve the

¹⁶ The Court also held that the equal protection arguments were not ripe for review and that the State Commission erroneously ruled that the sale would constitute an improper delegation of authority.

¹⁷ The complete text of these Decisions can be found as Attachments 2-4 of U S WEST's 1998 Petition.

¹⁸ This court opinion, having been rendered subsequent to the filing of U S WEST's 1998 Petition was not included in that filing. A copy can be obtained for Commission review, should the Commission be interested in the precise text of the opinion.

matters that are subject to the Supreme Court's review. At this time, these discussions continue in an attempt to resolve these matters.

E. Implementation Of Dialing Parity In New Equipment

As mentioned above, the current owner of the host switch had offered to sell it back to U S WEST. However, U S WEST declined the offer, given the absence of cost-effective means to render the switch Y2K compliant. The same technological shortcomings that made the switch one that the owner was willing to sell made it a bad investment for U S WEST.

Rather, U S WEST's business planning activities demonstrated that the better approach was to purchase a Nortel DMS10 switch, to be located in the town of McIntosh. (This decision was also supported by the potential purchasers of the equipment.) The McIntosh switch will operate as a host switch for new Nortel remote switches to be placed in Timber Lake and Morristown.

In February of 1999, U S WEST placed the orders for the switches and -- if all goes according to plan -- we expect shipment around the end of May. Once U S WEST takes possession of the equipment, the vendor (Nortel) will begin the installation. Before the switching equipment is turned over to U S WEST, the vendor has to move into each site, bolt equipment to the floors, and attach power equipment and cross connect blocks, so that customers' lines and trunks can be attached to this equipment.

This vendor work associated with the installation of the new host switch (McIntosh) is expected to take about four weeks, with an additional four to six weeks of installation time expected with respect to the two remotes (Timber Lake

and Morristown). Because the McIntosh wire center is being converted from a remote to a host switching center, there are requirements by the vendor that the power plant associated with the wire center be upgraded to meet the requirements for the new host switch. The standard interval for the provision of such power plant capabilities is six months. U S WEST has communicated with the vendor of this equipment that we have an urgent need for expedition. We believe this request has been escalated within the management ranks of the vendor and that, as a result, the necessary equipment will be available by the end of July, 1999.

At the point at which the vendor turns over the switching equipment to U S WEST, U S WEST will need to complete both outside and inside plant work, as well as labor-intensive translations work to cutover from the old offices. The outside plant work will involve the placement of additional radio facilities to handle the need for more capacity between McIntosh and Timber Lake (now that McIntosh, rather than Mobridge, is the "host" location).

Inside the offices, all lines and trunks in each central office -- including all special circuits serving business customers -- have to be physically wired to the new switching equipment. The personnel that will be doing this work, and maintaining the three offices) live 180 miles to the east of the wire centers (i.e., they live in Aberdeen, South Dakota) and are responsible for equipment at their Aberdeen staffed location, as well. Thus, the employees will have to work in shifts on the McIntosh, Timber Lake and Morristown conversions.

Once the affected lines are "y-spliced" (or half-tapped), the software is loaded into the switch and then board-to-board test procedures are conducted on each line

and trunk to ensure there are no hardware or software problems. Any discovered problems are fixed. This "testing/fixing" activity is done a minimum of three times so that all discovered problems are corrected prior to switch turnup.

Furthermore, the Ericsson software has certain calling features that U S WEST's customers are using today which have to be identified and compared with the Nortel switch features for proper translations into the new switch. If the feature translation cannot be accomplished or the manner in which the feature is used will change, customers will have to be notified.

It is anticipated that this work will take at a minimum 60 days, suggesting a "ready for cutover" date of around the end of October. However, this date could easily be delayed, given that U S WEST has never conducted an Ericsson to Nortel conversion and the anticipated conversion dates could prove unduly optimistic given the tasks which actually greet the network technicians.

U S WEST's Network Reliability Operations Center ("NROC") will have to establish an actual cutover date for the new switching equipment, which obviously cannot occur until all of the necessary installation work is completed. Right now, the NROC is scheduling switch cutovers for switches already in queue (i.e., all predicate technical work having been or to be completed) into the September through November timeframes. Assuming that the actual cutover will be ready to occur in November, the NROC has to add these switches to its schedule of cutovers for that month.

U S WEST, like other carriers is attempting to build in a "quiet time" for the months December, 1999 and January, 2000 to allow for responses to unanticipated

Y2K compliance issues. Thus, the scheduling of routine switch replacements has been somewhat accelerated (i.e., to avoid the months of December and January) and compressed. The cutover of the switches in South Dakota will need to be incorporated into this switch replacement schedule.

For all of the above reasons, U S WEST can only say that the equipment will be cutover sometime during the last quarter of 1999, probably after the end of October. Therefore, we would ask for a waiver date through December 31, 1999 (in case the cutovers could not be done before the beginning of December and have to be scheduled for the quiet period). Of course, if the equipment can be cutover earlier than that date, U S WEST will do so.

F. Direct Customer Impacts

Installation of DMS10 switching capabilities will ultimately provide more benefits to customers in the affected wire centers than the previously deployed equipment. For example, the switches will be Y2K compliant and will be able to support CLASS services, including Caller ID. Overall, the change-out in equipment clearly provides a net gain to the affected South Dakota customers.¹⁹

¹⁹ As indicated above, the affected wire centers are all on Native American land. The Telephone Authority "has been committed to working with the communities within the proposed exchanges to insure that telephone services needed to attract new business and to keep existing businesses are available at competitive rates." U S WEST 1998 Petition at 6. Moreover, the expansion of service options available through the new switching equipment is consistent with the Commission's objectives about expanding local services to Native Americans. See, e.g., Remarks of Chairman William E. Kennard, Federal Communications Commission, Public Hearing on Telephone Service to Indians on Reservations, "Overcoming Obstacles to Telephone Service to Indians on Reservations," Albuquerque, New Mexico, Friday, January 29, 1999 (As Prepared for Delivery), [www.fcc.gov/Speeches/Kennard/spwek903.html]

Should this waiver request be granted, it is U S WEST's current intention to send a direct mail notice to all customers served by the affected wire centers advising them that the date for 2-PIC toll dialing parity has been extended in their exchange(s) in accordance with the terms of the waiver granted.

III. A WAIVER IS CLEARLY WARRANTED

The instant waiver request is supported by imperatives of a legal and technical nature. While the legal aspects of the case primarily represent a "drag" factor with respect to U S WEST's ability to implement dialing parity on July 22, 1999,²⁰ the technical problems are inherent in the currently-utilized equipment. "Technical problems caused by purely exogenous circumstances may constitute special circumstances that would justify the granting of a waiver in the public interest."²¹ Here the public interest would certainly not be served by trying to gerryrig some type of dialing-parity capability on the previously-deployed equipment. It is better served by eliminating the "technical problem" through investment in more robust technology.

²⁰ That is, the "ideal" situation from U S WEST's perspective would have been that either the state appellate proceedings or our request for preemption to this Commission filed in early 1998 (or both) would have resolved the fundamental legal issues in such a manner that U S WEST and the Telephone Authority had a better sense of their legal property and common carrier rights with respect to the desired sale. As one awaits the legal resolution, there is a tendency to delay with respect to moving forward with "contingency plans," such as waiver filings, believing that relief is "just around the corner."

²¹ Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, Order, CC Docket No. 96-98, NSD File No. L-98-121, FCC 99-781 (rel. Apr. 22, 1999) ¶ 12.

Furthermore, the scope of the instant waiver request is well within a zone of reasonableness regarding implementation of 2-PIC dialing parity. While the implementation dates are beyond those outlined by the Commission in its March 23 Dialing Parity Order, the number of affected wire centers and access lines is small.

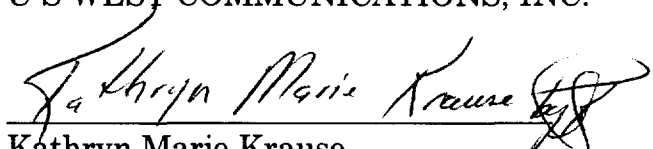
The existing special circumstances clearly warrant a deviation (slight at that) from the Commission's general rule and demonstrate a "more effective implementation of overall policy."²² Given the overall benefit that will inure to the residents now served by the existing technology, granting U S WEST's waiver request will result in a "predictable, workable"²³ solution that causes little injury to the consumer or competition.

For all of the above reasons, U S WEST urges the Commission to grant the instant Waiver Petition and allow U S WEST to implement dialing parity in the three-identified wire centers by December 31, 1999.

Respectfully submitted,

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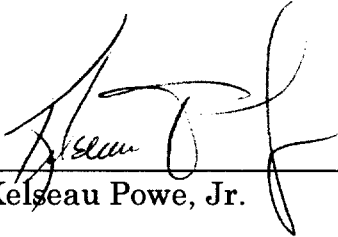
May 12, 1999

²² Id. ¶ 11.

²³ Id.

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 12th day of May, 1999, I have caused a copy of the foregoing **PETITION FOR WAIVER OF U S WEST COMMUNICATIONS, INC.** to be served, via hand delivery, upon the persons listed on the attached service list.



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